



U.S. Department of Justice

*United States Attorney
Northern District of New York*

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July 17, 2013

Hon. Thomas J. McAvoy
Senior United States District Judge
Binghamton Federal Building & U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *United States v. Glenn Unger*
Criminal Action No.: 12-CR-579 (TJM)

Dear Judge McAvoy:

The government submits this letter to apprise the Court of the status of its discovery disclosures to the defendant in the above referenced case.

On January 15, 2013, pursuant to Federal Rule of Criminal Procedure 16(a), the Government disclosed 4324 pages of bate-stamped discovery to the defendant at the Rensselaer County Jail, which included the following materials:

1. Arrest reports for Glenn Unger by the FBI, which included several post-arrest statements made by the defendant (See bate-stamp 3529-3535);
2. Photographs of the search warrant conducted at 10097 State Highway 37, Ogdensburg, NY on 12/30/12 as well as written reports, the search warrant application and the search warrant;
3. Photographs of the search warrant conducted at Storage Unit #308, at Reliable Storage, 950 Route 9, Castleton, NY on 12/19/12 as well as written reports, the search warrant application and the search warrant;
4. Various FBI investigative reports, including an FBI 302 Report of Interview of the defendant dated April 1, 2010, which contained several statements made by the defendant and is bate stamped 4197-4199; and

5. Discovery documents provided by the IRS including, but not limited to, the following: 1040's of Glenn Unger; B-1 Storage; Bank of America; Capital One; Chase; Check System; Citi; DMS; Empire Federal Credit Union; Empower Federal Credit Union; FIA; Google; Kinderhook Bank; Kross Publishing; Lien documents; National Bank; National Grid; Pay Pal; post office documents; Seacomm Federal Credit Union, TB Bank; the Colorado Bank; Transfirst, UPS, US Bank and Washington Mutual.

On July 17, 2013, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and L.R.Cr.P. 14.1, the Government notified the defendant of it's intent to use the expert testimony of William C. Kerr. Mr. Kerr is an expert in fictitious financial instruments and he will testify regarding the charges contained in Count 7 of the indictment. The government has also provided the defendant with a copy of Mr. Kerr's expert statement dated July 6, 2013, and a copy of the exhibits he examined before rendering his expert opinion.

On July 17, 2013, pursuant to Federal Rule of Criminal Procedure 16(a), the Government disclosed to the defendant a cd containing the forensic results of the computer examinations conducted on the computers seized from the defendant's residence.

Please feel free to contact me at (315) 448-0672, should you have any questions or concerns.

Very truly yours,

RICHARD S. HARTUNIAN
United States Attorney

By: /s/
Ransom P. Reynolds
Assistant U. S. Attorney

RPR
Enclosures

cc: Rick Baird, Esq. - stand-by counsel
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